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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

v.

JERRY JOHN MATHINS,
a/k/a "JOHN ROLLIE"
a/k/a "JOHN ROLLE BACK,"

and

BRAYSEAN OWENS,
a/k/a SEAN OWENS,

Defendants.

CRIMINAL NO. GLR-24-319

(Conspiracy to Commit Offenses Against
the United States, 18 U.S.C. § 371;
Securities Fraud, 18 U.S.C. § 513(a), (c);
Forfeiture, 18 U.S.C. § 981(a)(1)(C), 21
U.S.C. § 853(p), 28 U.S.C. § 2461(c))

UNDER SEAL

INDICTMENT

COUNT ONE
18 U.S.C. § 371 – Conspiracy

The Grand Jury for the District of Maryland charges that:

1. At times relevant to this Indictment, Defendants **JERRY JOHN MATHINS** ("MATHINS"), a/k/a **JOHN ROLLIE**, a/k/a **JOHN ROLLE BACK**, and **BRAYSEAN OWENS** ("OWENS") a/k/a **SEAN OWENS** (collectively the "DEFENDANTS") were residents of Laurel and Baltimore, Maryland, respectively.
2. The Maryland Motor Vehicle Administration ("MVA") was the state government entity responsible for issuing titles to motor vehicles owned by Maryland residents.
3. A Vehicle Identification Number or "VIN" was a unique series of letters and numbers used by the automotive industry to identify individual motor vehicles.
4. The sales price of a used vehicle generally was based on a combination of factors, including the make, model, year, condition, and mileage of the vehicle. In older vehicles, the

mileage could significantly impact the price of a vehicle.

5. As used in this Indictment, the following vehicle numbers refer to the vehicles identified below:

<u>Vehicle No.</u>	<u>Year/Make</u>	<u>Vehicle Identification Number</u>
1	2006 Honda Accord	1HGCM66896A028756
2	2009 Honda Odyssey	5FNRL38769B024304
3	2007 Honda Odyssey	5FNRL38687B004608

THE CONSPIRACY

6. Beginning, at least, as early as April 2021 and continuing through at least January 2024, in the District of Maryland and elsewhere,

**JOHN JERRY MATHINS,
a/k/a JOHN ROLLIE,
a/k/a JOHN ROLLE BACK,
and
BRAYSEAN OWENS,
a/k/a SEAN OWENS,**

the **DEFENDANTS** herein, conspired and agreed with each other, and other persons known and unknown to the Grand Jury, to commit offenses against the United States, that is:

- a. to knowingly and willfully reset and alter, and cause to be reset and altered, the odometers of motor vehicles, intending to change the milage registered by the odometers, in violation of 49 U.S.C. §§ 32703(2), 32709(b); and
- b. to make, utter, and possess counterfeit and forged securities of a State, with intent to deceive another person, organization, and government, in violation of 18 U.S.C. § 513.

THE PURPOSE OF THE CONSPIRACY

7. It was the purpose of the conspiracy to cause buyers of used motor vehicles,

including consumers, to pay more for vehicles than they would have paid if they had known vehicles' correct mileage readings.

MANNER AND MEANS OF THE CONSPIRACY

8. It was a part of the conspiracy that **OWENS**, and other known and unknown co-conspirators, purchased used motor vehicles, usually with high mileage.

9. It was further part of the conspiracy that the **DEFENDANTS**, and other known and unknown co-conspirators, caused the odometers of those vehicles to be rolled back to lower mileage figures.

10. It was further part of the conspiracy that the **OWENS**, and other known and unknown co-conspirators, resold the vehicles to innocent purchasers in the District of Maryland and elsewhere, concealing the high mileage of the vehicles and in many instances misrepresenting to the purchasers that the false low mileage readings were the vehicles' correct mileage readings.

11. It was further part of the conspiracy that **OWENS**, and other unknown co-conspirators, altered the titles of numerous vehicles before selling those vehicles to unsuspecting purchasers.

12. It was further part of the conspiracy that when the title of a purchased vehicle stated a high mileage, **OWENS**, and other known and unknown co-conspirators, caused the vehicle title to be altered to false low mileage to correspond with the rolled-back odometer.

13. It was further part of the conspiracy that **OWENS**, and other known and unknown co-conspirators, used false title documents with false low mileage figures to hide from subsequent purchasers the true high mileage of the vehicles that **OWENS** sold.

14. It was further part of the conspiracy that the actions and misrepresentations of the

DEFENDANTS resulted in the **OWENS** obtaining higher prices for sold vehicles than **OWENS** would have received if the vehicles had correct mileage readings, and that buyers of the vehicles, including consumers, paid more for the automobiles than they would have paid if they had known the vehicles' true mileage.

OVERT ACTS

15. In order to effect and accomplish the objects and purposes of the conspiracy, the **DEFENDANTS** did commit numerous overt acts, in the District of Maryland and elsewhere, including the following:

Vehicle No. 1

16. On or about December 2, 2022, **OWENS** purchased Vehicle No. 1 on behalf of B-City Auto & Detailing LLC ("B-City") at a wholesale auto auction located in Pennsylvania for approximately \$2,500. At that time, the vehicle's odometer showed approximately 221,754 miles.

17. On or before December 14, 2022, the **DEFENDANTS** altered and caused to be altered the existing Maryland Certificate of Title for Vehicle No. 1 to falsely state that the vehicle's mileage was 124,229 when purchased from the wholesale auction.

18. On or about December 14, 2022, the **DEFENDANTS** caused the falsely altered Maryland title to be submitted to the MVA reflecting the false odometer reading of 124,229.

19. On or about December 14, 2022, **OWENS** sold and caused the sale of Vehicle No. 1 at B-City in Maryland for approximately \$3,800 and falsely represented that the mileage was 124,229.

Vehicle No. 2

20. On or about January 2, 2024, **OWENS** purchased Vehicle No. 2 on behalf of B-City at a wholesale auto auction located in Maryland for approximately \$2,000. At that time, the vehicle's odometer showed approximately 203,274 miles.

21. On or before January 17, 2024, the **DEFENDANTS** altered and caused to be altered the existing Maryland Certificate of Title for Vehicle No. 2 to falsely state that the vehicle's mileage was 126,486 when purchased from the wholesale auction.

22. On or about January 17, 2024, the **DEFENDANTS** caused the falsely altered Maryland title to be submitted to the MVA reflecting the false odometer reading of 126,486.

23. On or about January 17, 2024, **OWENS** sold and caused the sale of Vehicle No. 2 at B-City in Maryland for approximately \$4,700 and falsely represented that the mileage was 126,486.

Vehicle No. 3

24. On or about April 13, 2021, **CO-CONSPIRATOR 1** purchased Vehicle No. 3 on behalf of B-City at a wholesale auto auction located in Maryland for approximately \$3,000. At that time, the vehicle's odometer showed approximately 192,898 miles.

25. On or before April 23, 2021, the **DEFENDANTS** altered and caused to be altered the existing Maryland Certificate of Title for Vehicle No. 3 to falsely state that the vehicle's mileage was 115,407 when purchased from the wholesale auction.

26. On or about April 23, 2021, the **DEFENDANTS** caused the falsely altered Maryland title to be submitted to the MVA reflecting the false odometer reading of 115,407.

27. On or about January 17, 2024, **OWENS and CO-CONSPIRATOR 1** sold and caused the sale of Vehicle No. 3 at B-City in Maryland for approximately \$4,800 and falsely

represented that the mileage was 115,407.

18 U.S.C. § 371

COUNTS TWO THROUGH FOUR
18 U.S.C. §§ 513(a), (c) – Securities Fraud

On or about the dates listed below, in the District of Maryland, the Defendant,

**BRAYSEAN OWENS,
a/k/a SEAN OWENS,**

did knowingly make, utter, and possess, and cause to be made, uttered, and possessed, forged and counterfeited securities of the State of Maryland, with the intent to deceive other persons, organizations, and governments; specifically, **OWENS** altered and caused to be altered the existing Maryland titles of the vehicles listed below, by writing or causing to be written the false mileages listed below, to deceive automobile dealerships, purchasers, and consumers regarding vehicles' true mileages, each such instance being a separate and additional Count of this

Indictment:

COUNT	DATE	VEHICLE
2	December 14, 2022	Vehicle No. 1
3	January 17, 2024	Vehicle No. 2
4	April 23, 2021	Vehicle No. 3

18 U.S.C. § 513(a), (c)
18 U.S.C. § 2

FORFEITURE ALLEGATIONS

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of a defendant's conviction under any of the offenses charged in Counts One through Four of this Indictment.

Securities Fraud Forfeiture

2. Upon conviction of any of the offenses alleged in Counts Two through Four of this Indictment, the defendant,

**BRAYSEAN OWENS
a/k/a SEAN OWENS,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such offense.

Substitute Assets

3. If, as a result of any act or omission of the defendants, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the

forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C.

§ 2461(c).

18 U.S.C. § 981(a)(1)(C)

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

Erek L. Barron / AOA
Erek L. Barron
United States Attorney

A TRUE BILL

Foreperson

Date:

10-30-24

SIGNATURE REDACTED